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STEVEN J. GROCKI Chief, Child Exploitation and Obscenity Section U.S. Department of Justice, Criminal Division 3 Eduardo Palomo Trial Attorney **FILED** Child Exploitation and Obscenity Section U.S. Department of Justice, Criminal Division Jun 06, 2024 5 1301 New York Avenue NW Washington, D.C. 20005 Telephone: (202) 579-5738 6 Facsimile: (202) 514-1793 7 SEALED Attorneys for Plaintiff 8 United States of America 9 IN THE UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 12 1:24-cr-00124-NODJ-BAM UNITED STATES OF AMERICA, CASE NO. 13 MOTION AND PROPOSED ORDER TO Plaintiff, 14 SEAL INDICTMENT v. 15 THELMO MENESES SANTOS, JR. 16 Defendant. 17 18 19 20 The government moves the Court, pursuant to Rule 6(e) of the Federal Rules of 21 Criminal Procedure, to order and direct that the Indictment returned by the Grand Jury 22 on June 6, 2024 charging the above defendant with violations of 18 U.S.C. §§ 2241(c) and 23 3261(a)(1) – Aggravated Sexual Abuse of a Child Committed by a Person Employed by the 24 Armed Forces Outside the United States; 18 U.S.C. §§ 2243(a) and 3261(a)(1) – Sexual 25 Abuse of a Minor Committed by a Person Employed by the Armed Forces Outside the 26 United States (2 counts); 18 U.S.C. §§ 2244(a)(5) and 3261(a)(1) –Abusive Sexual Contact 27 Committed by a Person Employed by the Armed Forces Outside the United States; 18 28 U.S.C. §§ 2244(a)(3) and 3261(a)(1) –Abusive Sexual Contact Committed by a Person 1 Motion to Seal Indictment

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1	Employed by the Armed Forces Outside the United States., be kept secret until the	
2	defendant named in this Indictment is either in custody or has been given bail on these	
3	offenses; and further order that until such time as the defendant is in custody or has been	
4	given bail, that no person shall disclose the finding of the Indictment or any warrants	
5	issued pursuant thereto, except when necessary for the issuance and execution of the	
6	warrants.	
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8		
9	Dated: June 6, 2024	Respectfully submitted,
10		STEVEN J. GROCKI
11		Chief, Child Exploitation and Obscenity Section U.S. Department of Justice, Criminal Division
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13	By	/s/ EDUARDO PALOMO EDUARDO PALOMO
14		Trial Attorney U.S. Department of Justice
15		C.E. Department of subside
16		
17	IT IS	SO ORDERED.
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19	Dated: June 6, 2024	Encir P. Grosp
20		ERICA P. GROSJEAN U.S. Magistrate Judge
21		o.s. Magistrave o dage
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